



m/037/0026

Michael Bradley <mbradley@utah.gov>

incoming

## Fwd: La Sal Mines Complex Interim Management Plan

2 messages

Paul Baker <paulbaker@utah.gov>  
To: Michael Bradley <mbradley@utah.gov>

Tue, Apr 19, 2016 at 6:00 PM

There are a few things in this e mail we could check, such as revegetation.

----- Forwarded message -----

From: <sarah@uraniumwatch.org>  
Date: Tue, Apr 19, 2016 at 11:47 AM  
Subject: La Sal Mines Complex Interim Management Plan  
To: David Pals <dpals@blm.gov>  
Cc: Paul Baker <paulbaker@utah.gov>

Dear Mr. Pals,

I have been following the La Sal Mines Complex (uranium mines) for a number of years. As you probably know, the BLM is still in the process of finalizing the EA and Record of Decision for the expansion of the Pandora Mine (part of the complex, along with the La Sal, Snowball, and Beaver Shaft).

The mine owner, Energy Fuels Resources (USA) Inc., submitted an Interim Management Plan (IMP) as part of the amended plan of operation (POA). That plan was resubmitted to the BLM and Division of Oil, Gas & Mining (DOGM) in May 2014. Although the mine has operated on and off since before 1980, the POA was the first time the required IMP was submitted to the BLM. The IMP has not been officially approved as part of the POA.

<https://fs.ogm.utah.gov/FILES/MINERALS/PERMITS/037/M0370026/2014/Incoming/05282014.pdf>

<https://fs.ogm.utah.gov/FILES/MINERALS/PERMITS/037/M0370012/2014/Incoming/05222014.pdf>

I have several concerns regarding that IMP, which include:

1. Cattle are permitted to wander at will on the Beaver Shaft waste rock pile on BLM land. There is plenty of evidence of their presence on the pile. There is a new cattle feeding operation next to the side road that leads to the Beaver Shaft mine and the waste rock pile. That operation was not considered in the draft EA.

The waste rock pile includes pieces of ore and other ore materials that emit radioactive particulates (beta and alpha) and gamma emissions.

2. The IMP states that Energy Fuels would monitor the sites semi-annually, but there is no requirement for them to submit the results of their monitoring to the BLM or DOGM.

3. In 2015 Energy Fuels seeded parts of the La Sal Mines Complex and other mines, but there has been no evaluation of the results of that seeding a year later. Did any of the seeds take? Where? Is there a need for reseeded?

4. The Interim Management Plan mentions the radon vents, but does not include the recent closure of some, and maybe all, of the vents to prevent the emission of radon. Such closure should be a requirement in the Interim Management Plan.

5. The Interim Management Plan does not include the closure of the mine portals to



prevent the emission of radon. For example, the Snowball Portal is not fully closed, so radon is being emitted from that portal and likely from the La Sal and Pandora portals. The portals should be blocked during periods of non-operation to limit the release of radon from the mines.

Thank you for your attention to these matters.

Sincerely,

Sarah Fields  
Director  
Uranium Watch  
PO Box 344  
Moab, Utah 84532  
[435-260-8384](tel:435-260-8384)

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Paul Baker  
Minerals Program Manager  
Utah Division of Oil, Gas and Mining  
[801-538-5261](tel:801-538-5261)  
M-W, F

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**Paul Baker** <[paulbaker@utah.gov](mailto:paulbaker@utah.gov)>  
To: Michael Bradley <[mbradley@utah.gov](mailto:mbradley@utah.gov)>

Tue, Apr 19, 2016 at 6:02 PM

One more thing: Could you please print the message for our file? We don't need to create a CCM task.  
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